

07-01-2002

U.S. Patent & TMO/TM Mail Rpt Dt. #70

TAB

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

PRAMIL S.R.L. (ESAPHARMA),)	
)	
Petitioner,)	
vs.)	Cancellation No. 32,341
)	
MICHEL FARAH,)	
)	
Registrant.)	

AGREED MOTION FOR EXTENSION OF TIME

COMES NOW the Registrant, Michel Farah, ("Registrant") and moves for an extension of the discovery and trial dates in the amount of ninety (90) days.

Counsel for Petitioner, Donald L. Dennison, Esq., has consented to this extension.

The requested extension is not for purposes of mere delay. The Parties require additional time to schedule discovery in this matter with respect to several key witnesses at a time mutually convenient for the parties and the witnesses. This is particularly the case, because the discovery in question may be duplicative of discovery in a pending civil action in the Eastern District of New York Federal Court, which discovery has been tentatively scheduled in August and September of this year. Thus, the parties wish to ensure that these witnesses will not be subjected to multiple depositions potentially pertaining to the same subject matter. Moreover, once these depositions take place, it may be further necessary to engage in follow-up discovery from the witnesses or other sources.

WHEREFORE, the Registrant moves for an extension of the discovery dates in the amount of ninety (90) days as follows:

Discovery Period to Close: November 9, 2002

30-day testimony period for party in position of plaintiff to close: February 7, 2003


30-day testimony period for party in position of defendant to close: April 8, 2003

15-day rebuttal testimony period for plaintiff to close: June 2, 2003

Respectfully submitted,

Dated: June 27, 2002

By:

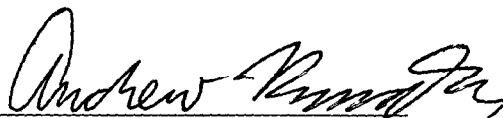

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing AGREED MOTION FOR EXTENSION OF TIME was served on Donald L. Dennison, Esq, Dennison, Scheiner, Schultz and Wakeman, 1745 Jefferson Davis Highway, Suite 612, Arlington, Virginia 22202 by United States mail, postage pre-paid this 27th day of June, 2002.

Respectfully submitted,


By:


Andrew W. Ransom
Florida Bar No. 964,344

CERTIFICATE OF MAILING

I HEREBY CERTIFY that an original and two copies were deposited by United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner for Trademarks, Attn: T.T.A.B., "Box TTAB", 2900 Crystal Drive, Arlington, Virginia 22202-3513, this 27 day of June, 2002.

Respectfully submitted,

By: 
Andrew W. Ransom
Florida Bar No. 964,344

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